

Marc Wolstenholme
5 Shetland Close
Coventry, England CV5 7LS
Telephone: 044 7827964404
Email: marc@mvwolf-fiction.co.uk
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,

Plaintiff,

vs.

RIOT GAMES, INC.,

Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PLAINTIFF'S MOTION IN LIMINE TO
ADMIT EVIDENCE

DATE: FEBRUARY 27, 2025
TIME: 10:00 A.M.
CRTRM: 6D

JANUARY 29, 2025

Dated this: JANUARY 29, 2025

M. WOLSTENHOLME
[MARC WOLSTENHOLME]

COMPARISON OF CHARACTERS FROM ARCANES & BLOODBORG- TWO BROTHERS.

PLAINTIFF'S MOTION IN LIMINE TO ADMIT
EVIDENCE 1

1. Introduction:

I, Marc Wolstenholme, am the plaintiff in this matter, representing myself pro se.

This declaration is made in support of my PLAINTIFF’S MOTION IN LIMINE TO ADMIT EVIDENCE, to submit additional evidence relevant to my claims against Riot Games, Inc. for copyright infringement, unfair competition, and intentional infliction of emotional distress.

2. Evidence Submitted:

I submit the following evidence of COMPARISON OF CHARACTERS FROM
ARCANE & BLOODBORG- TWO BROTHERS. This is not an exhaustive list,
but serves to demonstrate key elements of my original work and the substantial
similarities between my work and the infringing material produced by Riot
Games, Inc.

3. Comparison of Characters:

This document specifically shows the striking similarities between the two adoptive brothers in Bloodborg, Macaulay and Mateo, compared to the two adoptive brothers in Arcane, Mylo and Claggor.

Exhibits

Exhibit A. Juxtaposed Brothers.

In Bloodborg, for the two adoptive brothers, Macaulay and Mateo, the Plaintiff uses the literary device of Juxtaposition, making stark contrasts in their appearance, skills and personalities, creating an interesting dynamic and conflicting effect allowing these two characters to bounce off each other.

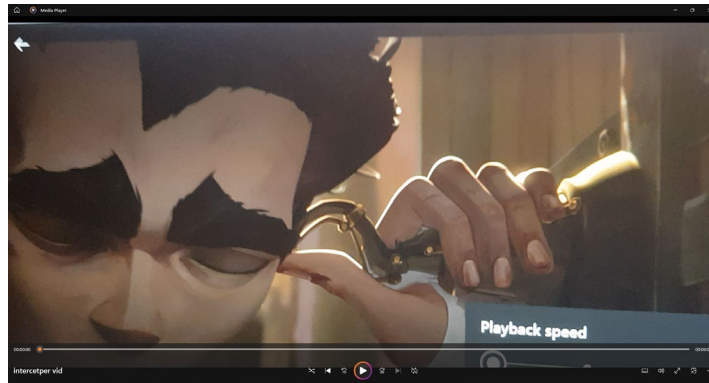
In Arcane, for the two adoptive brothers, Mylo and Claggor, respectively, the same dynamic is used. In the below image, the scrawny guy on the left is Mylo, alleged to be the counterpart of Macaulay. The big guy on the right is Claggor, alleged to be the counterpart of Mateo.



Exhibit B. Mylo from Arcane with Macaulay from Bloodborg.

Though set in very different narratives, Mylo and Macaulay share some striking similarities, particularly in their appearance, skill sets, emotional dynamics and their impact on the protagonists. Both are scrawny with shabby, sweeping hair. The difference in appearance is the hair color as Mylo has brown hair and Macaulay has mousy blonde hair.

Arcane- Mylo and his listening device.



From Bloodborg- “The group of Gangway children sitting on the floor in a semi-circle, all turned to face the makeshift digital radio.

‘I’m on it like boom sonic,’ called Macaulay, already scrambling to the Interceptor, his shabby blonde hair sweeping the communications display as he reached for the headset. Nobody could operate the interceptor quite like he could, he had built it after all, not from scratch but he had improved it and maintained it since he was eight years old. He had devoted five years to this communications system, he didn’t appreciate others playing around with it, not whilst he was here to operate it.”

B1. Personality: The Sarcastic Brother

Mylo (Arcane): Mylo is characterized as sarcastic, skeptical, and brash. He's often dismissive of Powder (Jinx), teasing her for her perceived incompetence and inability to contribute. His biting remarks mask his insecurity and frustration about their situation in the undercity. Despite his abrasive behavior, he genuinely cares for his family, particularly Vander, and wants to survive in a world that constantly puts them at risk.

Macaulay (Bloodborg): In Bloodborg, Macaulay is portrayed as the sardonic, quick-witted brother figure to Rook. Like Mylo, he uses humor as a defense mechanism, often making light of their dire circumstances. His snarky attitude serves as a coping strategy in the grim, dangerous world they inhabit, but underneath it all, he deeply cares for Rook and Mateo, their found family.

Comparison: Both Mylo and Macaulay adopt sarcasm and bravado as shields, masking their vulnerability and fear. They feel the weight of responsibility as older brothers (biologically or emotionally) and try to hide their anxieties behind their sharp tongues. They seem tough on the surface, but their harshness often stems from a desire to protect their siblings or companions, even if it isn't always expressed in the most nurturing way.

1 **B2. The Protective Older Brother Role**

2 **Mylo (Arcane):** Mylo plays the role of the older, more experienced member of
3 the gang, often positioning himself as a guide, even if he's dismissive of others' feelings—
4 particularly Powder's. His constant ribbing of Powder (Jinx) can be seen as an attempt to
5 toughen her up in a world that requires them to be strong and resourceful. Despite his cruelty,
6 there's an underlying sense that he's worried about their collective survival. Despite his older
7 brother's routine, he knows Vi is the natural leader of the gang.
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10 **Macaulay (Bloodborg):** Macaulay similarly occupies the older brother's role in
11 Rook's gang. His sarcastic and protective tendencies mirror Mylo's dynamic with Powder. He
12 feels the weight of keeping his family safe, particularly Rook and the Gangway Children, whom
13 he helped to raise in a sense of tough love. His pessimistic, slightly jaded outlook on life comes
14 from years of struggling, just like Mylo's cynicism about the harshness of the world they live in.
15 Macaulay, like Mylo, is skilled, he plays the older brother's routine, but he knows Rook is the
16 natural leader of the gang.
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20 **Comparison:** Both characters struggle with being the older sibling figure,
21 believing that being harsh or emotionally distant is the best way to protect their younger siblings
22 from the cruelties of the world. Their overprotective instincts manifest in criticism rather than
23 emotional support, but both ultimately care deeply for their found family. While struggling with
24 the older sibling role, they have further insecurities of knowing that they are not the leader nor
25 the strongest of the crew, thus they lean into tech and dexterity skills and gadgets.
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B3. Emotional Baggage and Insecurities

Mylo (Arcane): Mylo is a character driven by fear. Fear of failure, fear of losing his family, and fear of not being strong enough to survive. His constant teasing of Powder comes from a place of frustration because he feels like they need to be stronger as a group, and he sees her as the weakest link. His insecurities are rooted in the fact that they're always on the verge of disaster, living in a hostile environment, and he feels personally responsible for keeping everyone together. However, he knows that, in fights, he isn't up to the role. He isn't the leader he believes he should be, as an older male. Yet he knows Vi is better placed in this role.

Macaulay (Bloodborg): Macaulay's insecurities similarly emerge from a place of deep emotional conflict. He's haunted by the fear of losing Rook and Mateo, the two people he loves the most in the world. His sarcasm hides a deeply emotional core, just like Mylo, and his constant jabs and rough exterior are mechanisms to mask his own sense of inadequacy and fear that he might not be able to protect his family from the dangers of their dystopian world. He finds some sense of leadership stability or authority over the younger Gangway Children.

Comparison: Both characters struggle with a deep sense of insecurity, which manifests in their interactions with their younger siblings. They fear failure, particularly the failure to protect the ones they love. Their rough treatment of those closest to them is often a reflection of their internal struggles. They feel the weight of responsibility and don't know how to express their emotions in a way that conveys love or care effectively. With the younger

1 members, this need to protect and to find a sense of authority is rooted in a lack of control and
2 power to protect, thus it can come across as slightly bullying.

3 4 **B4. Their Technical Skills**

5 **Mylo (Arcane):** Mylo isn't particularly known for being a technical genius, yet
6 he does operate a listening device and other gadgets. In Arcane, it's clear that the more
7 technically adept characters are Jinx and Viktor, who demonstrate an affinity for machines and
8 inventions. Of the gang, although Powder tries, she hasn't yet developed the skills Mylo has.

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10 Mylo, on the other hand, operates more as a street-smart, agile member of the
11 gang, skilled in handling smaller tasks like lockpicking and navigating the complex streets and
12 back alleys of Zaun. His strengths are more related to survival skills, tactical thinking in fights,
13 and situational awareness, rather than engineering or inventing. However, within his gang, he
14 does fit the role of gadget boy.
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17 **Macaulay (Bloodborg):** Macaulay, while also not a technical genius on the level
18 of an inventor, displays a higher level of technical competency than Mylo. He is proficient in
19 various technical tasks within the context of the Bloodborg world, where advanced technology
20 and weaponry are prevalent. He can handle, modify, and repair equipment, particularly weapons,
21 radio and listening devices, and gadgets that the group uses to survive. His ability to understand
22 and work with the tech around him is key to keeping the group functioning in a hostile
23 environment filled with cybernetic threats and technological dangers.
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1 **Comparison:** Mylo’s tech skills are more grounded in street-level pragmatism
2 such as picking locks, setting traps, and improvising in fights. He’s not known for creating or
3 working with complex technology. However, within his gang, he does fit the role of gadget boy.
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5 Macaulay’s tech skills, while not as advanced as an engineer’s, are more focused
6 on practical combat technology. He knows how to maintain and utilize advanced weaponry and
7 tech to ensure the survival of his group. His proficiency with technology exceeds Mylo’s because
8 he regularly interacts with more sophisticated machinery and weaponry in the high-tech world of
9 Bloodborg.
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11 **B5. Dexterity and Agility**

12 **Mylo (Arcane):** Mylo’s dexterity and agility are key aspects of his character.
13 He’s fast, nimble, and often relies on his quick reflexes to get out of tight situations. His natural
14 agility makes him useful during heists and street fights, where speed and the ability to
15 outmaneuver opponents are critical. He is skilled at climbing, parkour, and navigating the
16 industrial structures of Zaun, showing he’s more physically adept than his younger siblings. His
17 dexterity is primarily physical, helping him execute fast, precise movements during fights and
18 escape scenarios.
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22 **Macaulay (Bloodborg):** Macaulay is also highly dexterous, but his agility and
23 dexterity are more combat-oriented in nature. He combines his natural agility with his
24 proficiency in using technology and weapons, making him a skilled fighter in both melee and
25 ranged combat. He’s able to maneuver quickly in combat situations, making use of cover,
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1 advanced weaponry, and tactical movement to outflank enemies. His dexterity is tied to his
2 tactical intelligence, allowing him to quickly assess and exploit weaknesses in his enemies and
3 surroundings.
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6 **Comparison:** Mylo's dexterity is more about physical agility, helping him climb,
7 run, and fight with speed and precision. His ability to navigate tight, urban spaces and his
8 expertise in parkour make him an asset in heists and escapes. His quick hands help with minor
9 tech skills, like lockpicking, but his primary strength lies in street-level agility.
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11 Macaulay's dexterity, while also tied to agility, is focused more on combat
12 dexterity. His ability to move swiftly in battle, combined with his skills in handling tech-based
13 weaponry, sets him apart as a more combat-efficient character. His tactical combat dexterity
14 gives him an edge in advanced fights, allowing him to outmaneuver enemies while using tech to
15 his advantage.
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17 **B6. Use of Gadgets/Tools**

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19 **Mylo (Arcane):** Mylo doesn't typically rely on complex gadgets or tools. His
20 primary tools are his lockpicking skills and whatever weapons or makeshift equipment the gang
21 has access to. In the world of Arcane, Mylo's tool usage is mostly improvised. While characters
22 like Jinx create intricate gadgets and bombs, Mylo tends to stick to basic, street-level tools that
23 aid him in physical tasks and survival.
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1 **Macaulay (Bloodborg):** Macaulay, being part of a tech-heavy world like
2 Bloodborg, regularly uses advanced gadgets and weapons. He's adept at handling high-tech
3 tools, such as energy weapons, grenades, and surveillance gadgets. Macaulay's ability to modify
4 or repair these tools also gives him an edge, making him a valuable asset in battle. His familiarity
5 with these gadgets reflects his comfort with technology, even if he's not an inventor like other
6 characters might be.
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9 **Comparison:** Mylo primarily uses basic, low-tech tools—his hands, lockpicks, or
10 whatever weapons are available in Zaun. His skills are about surviving with what he can
11 scrounge up. Macaulay relies on a more sophisticated array of gadgets and tech-based weapons,
12 such as guns, explosives, and advanced gear typical in the high-tech world of Bloodborg. His
13 ability to handle and maintain this equipment is far superior to Mylo's, showing that Macaulay is
14 much more comfortable with advanced technology and combat gadgets. However, within their
15 groups and their different Punk dystopian worlds, they both fit the same roles of gadget boy and
16 they both operate the listening and other equipment.
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19 20 **B7. Their Fate: Tragic Ends**

21 **Mylo (Arcane):** Mylo's story comes to a tragic end during the heist of Vander,
22 gone wrong. He is impaled by a pole through his body. In a moment that solidifies the divide
23 between Powder (Jinx) and the rest of the group, Powder's failed attempt to help leads to Mylo's
24 death. His demise, along with the death of Claggor, represents the shattering of the group and the
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1 ultimate tragedy of Powder's attempts to prove her worth. His death serves as the emotional
2 tipping point for Powder's transformation into Jinx.

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4 **Macaulay (Bloodborg):** Macaulay, too, meets a tragic end. He is impaled by a
5 pole through his body. In Rook's POV, Macaulay's death is devastating, shattering Rook's
6 emotional world. His loss is the moment that breaks Rook's innocence and solidifies her path of
7 revenge and survival, the same tipping point we see in Vi and Jinx's storylines. Like Mylo,
8 Macaulay's death acts as a catalyst for the main character's emotional and psychological
9 transformation.
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13 **Comparison:** Both Mylo and Macaulay, along with their respective brothers, play
14 pivotal roles in the protagonists' emotional arcs. Their deaths are more than just tragic, they are
15 the turning points that push Vi and Rook toward their future paths. Mylo's death fractures
16 Powder and sets her on the dark path to becoming Jinx, while Macaulay's death propels Rook
17 into a world of vengeance, defining her future actions and her hardened outlook on life. Their
18 deaths are symbolic of the loss of innocence and the descent into the harsher realities of their
19 respective worlds.
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22 **B8. Sibling Relationships: Impact on the Protagonists**

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24 **Mylo's Influence on Vi and Powder:** Mylo's tough, often dismissive attitude
25 leaves a lasting impact on Powder, leading to her sense of inadequacy and eventual
26 transformation into Jinx. His relationship with Vi, on the other hand, is one of shared
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responsibilities. While Vi doesn't have the same emotional baggage with Mylo that she has with Powder, his death adds to the weight of her guilt and sorrow, pushing her toward her protective, big-sister and leadership roles even more.

Macaulay's Influence on Rook: Macaulay's relationship with Rook is central to her emotional development. Much like Mylo, Macaulay's attitude, while caring, is often tough and sarcastic. After his death, Rook is left to navigate her world without him, leading her down a path of internalized grief and vengeance. His influence is deeply felt, as his death represents the shattering of her emotional core, much like Mylo's death marks a similar turning point for Vi and Powder.

Comparison: Both Mylo and Macaulay serve as emotional anchors for the protagonists, and their deaths create lasting scars that drive Vi and Rook's future actions. Their relationships are filled with tension, frustration, and underlying affection, but both characters leave their respective siblings with feelings of loss, guilt, and a desire for redemption or revenge.

B9. Conclusion: The Similarity of Mylo and Macaulay

In many ways, Mylo and Macaulay function as the same archetype within their respective stories. Yet the similarities are nuanced and detailed far beyond what would be expected from two unrelated pieces of writing.

1 They are both:

2 Sarcastic, tough older brothers who care deeply for their families, but struggle to
3 express that care in a nurturing way.

4 Burdened by responsibility and plagued by insecurities about their ability to
5 protect those they love.

6 Catalysts for emotional transformation, as their deaths mark pivotal turning points
7 for the protagonists, Vi and Rook.

8 Symbols of loss and brokenness, driving Vi and Rook toward darker paths of
9 survival, guilt, and, in Rook's case, vengeance.

10 Gadget boys and listening devices, whilst the gadgets and listening devices are of
11 their respective worlds, they share the same functions and features.

12 Death by impalement, both characters meet gruesome ends, both impaled through
13 the body, both along side the deaths of their respective brothers.

14 Through these comparisons, we can see that Mylo and Macaulay serve similar
15 narrative functions: they are the heart of their found families, and their tragic fates shape the
16 emotional arcs of the protagonists in profound ways. Outside of the narrative similarities, the
17 personal characteristics are also remarkably similar, as are the juxtaposition of these characters
18 against their brothers, and their roles in the gangs.

Exhibit C. Claggor from Arcane and Mateo from Bloodborg

Though set in different narratives, Claggor and Mateo share some striking similarities, particularly in their appearance. Both are portrayed as stout, strong, brawny headfirst, think later brawlers, always wanting to help, even if they know they are not in the greatest shape to take on the task. They are both lion-hearted, loyal to the core reliable and physical presences in their respective groups.

Claggor From Arcane



From Mateo from Bloodborg- “‘Quick, someone turn on the interceptor to see if they followed Rook,’ said Mateo, pointing to the interceptor with a stout finger, rolls of fat coiled at his nape as he tilted his head.”

1 **C1. Loyalty and Team Role**

2 **Claggor (Arcane):** Claggor is a loyal and reliable member of Vander's crew,
3 sticking closely by Vi, Mylo, and Powder. He's one of the group's dependable core members,
4 serving as the muscle but also showing a softer, more nurturing side compared to Mylo's
5 constant bickering. Claggor's loyalty to his friends is unshakeable, he's willing to risk his life for
6 them, and he follows Vi's lead without question, trusting her decisions in their dangerous
7 undertakings. His sense of duty and care for his friends makes him a stabilizing and physical
8 figure within the group.
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11 **Mateo (Bloodborg):** Mateo plays a similar role in his group, serving as a trusted,
12 loyal member. In Bloodborg, where danger comes in both cybernetic and human forms, Mateo is
13 the one who holds the team together. His calm, thoughtful nature complements the more
14 aggressive or reckless members of the crew. Like Claggor, Mateo is the big softy glue that binds
15 his team, offering emotional support as much as he provides his strength in combat. He is the
16 heart of the team in many ways, always thinking of the greater good and what's best for his
17 friends, and he will go to great lengths to protect them.
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21 **Comparison:** Claggor and Mateo are both the emotional anchors of their groups,
22 loyal to a fault and deeply protective of their friends. They both provide stability and act as
23 dependable figures that their more volatile comrades can lean on. Both Claggor and Mateo can
24 be seen as the heart and conscience of the team, characters who keep the group grounded with
25 their unwavering loyalty and care.
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1 **C2. Physical Strength and Reliability**

2 **Claggor (Arcane):** In addition to his loyalty, Claggor stands out for his physical
3 strength. He's the powerhouse of Vander's crew, often taking on tasks that require brute force,
4 whether it's knocking down doors or providing the muscle in a fight. His large frame and strong
5 physique make him a reliable asset when it comes to dangerous situations that need someone
6 with physical power. Even though he doesn't possess the agility of Mylo or Vi's leadership
7 qualities, Claggor's sheer strength and dependability make him a key part of the team's
8 operations.
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12 **Mateo (Bloodborg):** Mateo's strength and reliability are also key attributes. In
13 Bloodborg, his strength is more than just physical, he possesses a quiet resilience that sees him
14 through tough situations. He's known for being the one his crew can count on when things go
15 wrong, a reliable force in battle who can take hits and keep going. He often uses his strength to
16 protect others, placing himself between danger and his teammates. Mateo's role, much like
17 Claggor's, is to provide stability and strength in action, making him a crucial component of the
18 team's success in both combat and emotional resilience.
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21 **Comparison:** Both Claggor and Mateo provide physical strength and reliability to
22 their teams, stepping up when situations require someone with brawn and a calm head. Their
23 presence reassures their comrades that they have someone solid to rely on, both in fights and in
24 navigating the harsh environments they inhabit. From Rook's perspective, they would both be
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1 seen as pillars of strength, representing the steadfast, unshakable support that holds a crew
2 together.

3 **C3. Technical and Problem-Solving Skills**

4 **Claggor (Arcane):** While not a technical genius, Claggor shows a surprising
5 knack for problem-solving, especially in high-stress situations. He's practical and resourceful,
6 able to think quickly on his feet to help the group navigate tricky situations. For instance, when
7 the group needs to escape from a collapsing building or fend off attackers, Claggor's pragmatism
8 often shines through. He is not the one building gadgets like Powder or strategizing like Vi, but
9 he's good at improvising solutions and using his strength to overcome obstacles in creative ways.
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12 **Mateo (Bloodborg):** Mateo's problem-solving skills are more sophisticated due
13 to the higher-tech world of Bloodborg. He's capable of operating and troubleshooting advanced
14 machinery, helping his team navigate a world filled with technology and cybernetic threats.
15 While he isn't a tech expert like some characters, Mateo is practical and understands how to use
16 his environment and the tools at his disposal to help his group succeed. He's often the one who
17 helps devise quick fixes for failing systems or figures out how to turn a disadvantage into an
18 advantage using the tech around him.
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22 **Comparison:** Claggor's problem-solving abilities are more physical and
23 situational, using his strength and practical thinking to overcome obstacles. He's not an inventor,
24 but he can think fast and use what's available to survive. Mateo's problem-solving skills involve
25 more technical acumen, as he deals with more complex tech-related issues in Bloodborg. He's
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1 able to think tactically and use technology to his advantage, though, like Claggor, he's not the
2 tech expert of the group. From Rook's POV, or Vi's perspective, both characters would be seen
3 as reliable problem-solvers, albeit in different contexts. Claggor in a low-tech, survivalist
4 environment and Mateo in a high-tech, cybernetic world. They share this similarity, in their own
5 rights.
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8 **C4. Emotional Intelligence and Team Dynamics**

9 **Claggor (Arcane):** Claggor is arguably the most emotionally grounded of
10 Vander's crew. While Mylo tends to be brash and Powder is sensitive, Claggor is calm,
11 supportive, and always looking out for the emotional well-being of his friends. He's particularly
12 protective of Powder, showing a big-brother-like care for her feelings and vulnerabilities. His
13 emotional intelligence helps to keep the group together during tense moments, acting as a
14 mediator when conflicts arise. He doesn't let his emotions drive him into reckless actions,
15 instead providing a soothing, calm presence that helps balance out the chaos.
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19 **Mateo (Bloodborg):** Mateo also exhibits strong emotional intelligence, which
20 helps him navigate the tense, high-stakes environment of Bloodborg. In a world where the
21 emotional toll of constant danger and cybernetic threats weighs heavily on the group, Mateo's
22 calm, thoughtful nature helps keep everyone focused and grounded. He's not the loudest or most
23 confrontational, but his ability to understand and empathize with his comrades makes him
24 invaluable when tensions flare. Like Claggor, Mateo uses his emotional intelligence to keep the
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1 group's dynamics healthy, offering support when his friends are struggling or making difficult
2 decisions.

3 **Comparison:** Both Claggor and Mateo demonstrate a high level of emotional
4 intelligence, acting as the emotional anchors of their respective teams. They provide support,
5 stability, and a calm, collected presence that helps their comrades when things get tough. From
6 Rook's or Vi's perspective, these two would be seen as emotionally grounded characters, whose
7 primary concern is the well-being and cohesion of their groups, offering a crucial balance to the
8 more volatile or emotionally driven members of the crew.
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11 **C5. Conclusion: Claggor vs. Mateo – The Heart and Muscle of the Team**

12 Claggor is a strong, loyal, and emotionally intelligent figure in Arcane, providing
13 physical power and emotional support to his team. He isn't the tech expert or the strategist, but
14 his presence is essential for keeping the group together, offering strength and dependability in
15 every situation.
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18 Mateo mirrors many of these qualities in Bloodborg. He's the reliable, strong-
19 hearted member of his team, providing the same balance of emotional intelligence, physical
20 strength, and practical problem-solving. However, he operates in a more advanced, tech-heavy
21 world, giving him a bit more technical competency than Claggor, although their core values of
22 loyalty and dependability are strikingly similar.
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24 Claggor and Mateo both stand out as the backbone of their respective crews.
25 There gangs appreciate their steadiness, loyalty, and emotional intelligence, seeing them as
26 crucial to maintaining balance and stability amidst the chaos their teams often face. Both
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1 characters serve as the reliable "muscle" but also as the emotional "big softy" glue, making sure
2 the more reckless members of their groups don't fall apart. These similarities, along with their
3 group dynamics and roles within their respective stories, are outstandingly similar, far beyond
4 chance of what would be expected from two unrelated bodies of work.
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9 The Plaintiff, Marc Wolstenholme, M.W. Wolf.

10 Date: JANUARY 29, 2025

11 Signed: *M. WOLSTENHOLME.*
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